

Judge: Marc Barreca  
Chapter: 13  
Hearing Date: October 14, 2015  
Hearing Time: 9:00 am  
Hearing Location: Marysville Municipal Court  
1015 State Ave. Courtroom 1  
Marysville, WA 98270

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

In Re: **MARY VERONICA MANCINI**,  
Debtor.

IN CHAPTER 13 PROCEEDING  
NO. 15-14598

TRUSTEE'S OBJECTION TO CONFIRMATION

The Trustee objects to confirmation of the debtor's plan, filed September 22, 2015 (ECF No. 16) as follows:

The debtor is an above median income debtor. The debtor's amended B22C (ECF No. 17) produces a monthly disposable income of \$478.89. This corresponds to a PDI of \$28,733.40. The debtor's amended plan (ECF No. 16) lists a PDI of \$0.00. The debtor will need to list her correct PDI in her plan. Additionally, the debtor's first plan (ECF No. 2) listed a PDI of \$15,550.58. The debtor would have to note for hearing the changes that were made to her plan. The debtor testified at her 341 meeting that she owned a VW Passat that is not listed on her Schedule B. The debtor should amend the schedule to include this additional vehicle. The debtor should increase her plan payment for feasibility. Based on the Trustee's calculations of the scheduled and filed claims, the Trustee estimates the debtor's plan payment will need to be approximately \$1,005.00 per month. The Trustee reserves the right to assert additional bases for this pleading.

## THE TRUSTEE REQUESTS:

That the Court enter an order denying confirmation of the debtor's plan, and setting deadlines for filing and noting a feasible amended plan.

Dated: October 08, 2015

/s/ K. Michael Fitzgerald  
K. Michael Fitzgerald, WSBA #81  
Chapter 13 Trustee

## TRUSTEE'S OBJECTION TO CONFIRMATION - 0

## Chapter 13 Bankruptcy Trustee 600 University St. #2200

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